

1 WRIGHT, FINLAY & ZAK, LLP  
2 Darren T. Brenner, Esq.  
3 Nevada Bar No. 8386  
4 Lindsay D. Dragon, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 637-2345; Fax: (702) 946-1345  
9 [dbrenner@wrightlegal.net](mailto:dbrenner@wrightlegal.net)  
10 [ldragon@wrightlegal.net](mailto:ldragon@wrightlegal.net)  
11 *Attorneys for Plaintiff, Bank of America, N.A.*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 NORTH AMERICAN TITLE GROUP, INC.,  
14 et al.,

15 Defendants.

Case No.: 2:20-cv-01514-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE A  
~~PROPOSED~~ DISCOVERY PLAN**

**(Third Request)**

16 Plaintiff, Bank of America, N.A. (“BANA”) and Defendant, North American Title  
17 Insurance Company (“NATIC”), by and through their respective undersigned counsel, hereby  
18 stipulate and agree as follows:

19 This is one of many actions pending before the Nevada state and federal courts involving  
20 a lender’s alleged entitlement to coverage under a title insurance policy following an HOA  
21 foreclosure sale. After the Complaint was filed, BANA and NATIC entered into global settlement  
22 negotiations to discuss the resolution of approximately 100 similar title insurance claims,  
23 including this case. The Parties stipulated to stay this case to achieve that purpose and on August  
24 21, 2021, this Court entered its Minute Order continuing the stay this case. ECF No. 32. On  
25 September 22, 2022, the Parties submitted a Joint Status Report [ECF No. 33], and on September  
26 24, 2022, the Court issued a Minute Order requiring that the Parties to file settlement documents,  
27 stipulation for dismissal or joint status report within 60 days. ECF No. 34.  
28

1 The Parties submitted a Joint Status Report on November 22, 2022, wherein the Parties  
 2 advised that the September 29, 2022 mediation was unsuccessful and that the Parties would  
 3 submit a joint proposed discovery plan by December 22, 2022. ECF No. 36. The deadline was  
 4 subsequently extended twice and is currently due February 3, 2022. ECF Nos. 39, 41. While the  
 5 proposed joint discovery plan has been drafted, the Parties need additional time to review and  
 6 finalize the terms and are requesting an additional seven (7) days to do so, through and including  
 7 February 10, 2023.

8 Counsel for NATIC does not oppose the request for an extension. This is the third request  
 9 for an extension which is made in good faith and not for purposes of delay.

10 **IT IS SO STIPULATED.**

11 DATED this 3<sup>rd</sup> day of February, 2023.

DATED this 3<sup>rd</sup> day of February, 2023.

12 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

14 /s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

15 Lindsay D. Dragon, Esq.

Kevin S. Sinclair, Esq.

16 Nevada Bar No. 13474

Nevada Bar No. 12277

17 7785 W. Sahara Ave., Suite 200

16501 Ventura Blvd, Suite 400

18 Las Vegas, Nevada 89117

Encino, California 91436

*Attorneys for Plaintiff, Bank of America,  
N.A.*

*Attorneys for Defendant, North American Title  
Insurance Company*

22 IT IS SO ORDERED.

23 

24 Cam Ferenbach

25 United States Magistrate Judge

26 DATED 2-6-2023